

**Potomac Law Group, PLLC**  
Emma Leheny (Cal. Bar. No. 196167)  
eleheny@potomacclaw.com  
1255 Treat Boulevard, Suite 300  
Walnut Creek, CA 94597  
1717 Pennsylvania Avenue, NW, Suite 1025  
Washington, DC 20006  
Tel: (202) 670-1094  
Fax: (202) 318-7707

*Counsel for ProctorU, Inc. d/b/a Meazure Learning*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

KATRINA MCDOWELL,  
individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

PROCTORU, INC. d/b/a  
MEAZURE LEARNING,

Defendant.

Case No. 5:25-cv-00705

**STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT  
BY NOT MORE THAN 30 DAYS (L.R.  
8-3)**

Complaint Filed: March 17, 2025

Current Response Date: April 9, 2025  
New Response Date: April 18, 2025

WHEREAS, on March 17, 2025, Plaintiffs filed their putative class action complaint (ECF 1) against Defendant, ProctorU, Inc. d/b/a Measure Learning (“Meazure Learning”);

WHEREAS, Defendant’s response to the Complaint is due on April 9, 2025;

WHEREAS, the parties agree to extend the deadline for Defendant to Answer or otherwise respond to the Complaint by 9 days.

NOW, THERFORE, the parties stipulate as follows:

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT  
MORE THAN 30 DAYS (L.R. 8-3)  
CASE NO. 5:25-cv-00705

1 1. The deadline for Defendant to Answer or otherwise respond to the  
2 Complaint will be extended to April 18, 2025.

3 Dated: April 9, 2025

4 /s/ Lisa T. Omoto

5 Lisa T. Omoto (Cal. Bar No. 303830)  
6 Faruqi & Faruqi, LLP  
7 1901 Avenue of the Stars  
Suite 1060  
8 Los Angeles, California 90067  
Tel: (424) 256-2884  
9 Fax: (424) 256-2885  
lomoto@faruqilaw.com

10 *Attorneys for Plaintiff*

/s/ Emma Leheny

11 Emma Leheny (Cal. Bar. No. 196167)  
12 **Potomac Law Group, PLLC**  
13 1255 Treat Boulevard, Suite 300  
14 Walnut Creek, CA 94597  
15 1717 Pennsylvania Avenue, NW,  
Suite 1025  
16 Washington, DC 20006  
17 Tel: (202) 670-1094  
18 Fax: (202) 318-7707  
eleheny@potomacclaw.com

19 *Counsel for Defendant ProctorU, Inc.*  
20 *d/b/a Meazure Learning*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record who have appeared in this case on behalf of the parties will receive the Court's notification of electronic filing.

/s/ Emma Leheny  
Emma Leheny (Cal. Bar. No. 196167)